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—The Dispensary Act of March 6, 1896, Sec. 37, providing that "any person handling contraband liquors in the night time or delivering the same shall be guilty of a misdemeanor," *held*, by a divided court, (McIver C. J., and Gary, A. J., dissenting) to be a valid exercise of the police power of the state, and not violative of the interstate commerce clause (Art. 1, §8) of the Federal Constitution. Also, intoxicating liquor purchased outside the state by a party and by him carried across the state line for his own use is "contraband" after its arrival in the state, unless the regulations of the dispensary law of 1895 have been complied with. The court considered that the U. S. Supreme Court in *Scott v. Donald*, 165, U. S. 68, meant to declare the dispensary act of 1895 invalid only in so far as the state thereby attempted to interdict the delivery by a common carrier of any alcoholic liquors from without the state to a consignee within the state for his own use; and that by "arrival," as used in the "Wilson Bill" (Act of Aug. 8, 1890), was meant the arrival of such liquors into the hands of the consignee within the state. *Vance v. W. A. Vandercook*, 170 U. S. 438; *Rhodes v. Iowa*, 170 U. S. 412.

CORPORATIONS—CONSTRUCTION OF CHARTER—SOUTH & N. A. R. R. Co. v. HIGHLAND AVE. & R. R. Co., 24 S. 114 (Ala.).—A power to "build, own and operate street railroads," does not convey by implication the power to construct a freight railroad around a city to transfer freight cars. Street railroad means a railway passenger carrier whose road lies along and upon the streets of a city, town or village.

CRIMINAL LAW—EVIDENCE—CURTIS v. STATE, 24 S. 111 (Ala.).—On trial for forgery of a mortgage a witness was allowed to testify that he had refused defendant advances without further security, that defendant had said he had other security mortgages and the like, and that shortly after the mortgage in question was given witness by the defendant and advances made. *Held* admissible, two justices taking the ground that it was admissible to show motive, two deciding that it was admissible to show the course of business between witness and defendant. Brickell, C. J., dissents on the ground that the testimony is immaterial and irrelevant.

CRIMINAL LAW—INDICTMENT—DATE OF OFFENSE—CONRAD v. STATE, 47 S. W. 628 (Ark.).—An indictment found July 14, 1896, charged that the accused did commit an offense May 15, 1898. The statutes provided that the indictment must contain "a statement of the acts constituting the offense in ordinary and concise language and in such a manner as to enable a person of common understanding to know what was intended," and that "the statement of the indictment as to the time at which the offense was committed is not material further than as a statement that it was committed before the time of the finding of the indictment." *Held*, Riddick, J., dissenting, that the indictment was good.

CRIMINAL LAW—LARCENY—FALSE PRETENSES—PROCURING MONEY FOR SPECIAL PURPOSE—INTENT TO APPROPRIATE—PEOPLE v. SUMNER, 53 N. Y. Sup. 817.—In negotiating a sale of land for his principals, defendant broker falsely represented to the complainant that he had an arrangement by which it could be transferred to another person at a large profit. Upon the payment of a small amount of the purchase price, defendant assured the complainant that upon the further immediate payment of \$1,000 the purchase price would be reduced one-third. The \$1,000 was accordingly delivered to the defendant under an agreement that it should not be paid to anybody until the title was examined.